

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*MSP Recovery Claims, Series, LLC. v.
Huahai US, Inc., et al.*

Case No: 1:18-cv-25260-CMA

**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF MSP RECOVERY CLAIMS, SERIES LLC**

PLEASE TAKE NOTICE that, in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. (collectively, “Teva”) will take the deposition upon oral examination of **MSP Recovery Claims, Series LLC (“MSPRC”)** on **March 23, 2021 at 9:00 a.m. EST** at 5000 S.W. 75th Avenue, Suite 400, Miami, Florida 33155. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of

this case.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, MSPRC is required to designate one or more officers, directors, managing agents, or one or more other persons who consent to testify on its behalf and who have knowledge of and are adequately prepared to testify concerning topics which will be determined after the parties have discussed proposed topics pursuant to the meet-and-confer requirement. Teva requests that MSPRC identify the designee for each topic to Teva, in writing, at least one week prior the deposition. Also, no later than one week prior to the deposition, MSPRC is requested to produce any and all documents in its possession, custody, or control relating to each topic to the extent all such documents have not been previously produced.

The attorney contacts for the deposition are:

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Date: February 19, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff MSP Recovery Claims, Series LLC to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on February 19, 2021:

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